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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CARRIEL KING,

Plaintiff,

v.

AMAZON.COM SERVICES LLC; and DOES
1-50, inclusive,

Defendants.

Case No. 2:24-cv-01499-RFB-MDC

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISCOVERY
DEADLINES**

(FIRST REQUEST)

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendant AMAZON.COM SERVICES LLC (“Defendant”) and Plaintiff CARRIEL KING (“Plaintiff”) (collectively, the “Parties”) stipulate to amend the Discovery Plan and Scheduling Order (**ECF No. 23**) by extending the outstanding discovery deadlines for a period of ninety (90) days.

This is the first request for an extension to the Discovery Plan and Scheduling Order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

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DISCOVERY COMPLETED

The parties have each exchanged their initial disclosures, propounded written discovery, and issued initial deposition notices.

DISCOVERY REMAINING TO BE COMPLETED

Respond to written discovery and conduct depositions.

REASONS FOR REQUESTED EXTENSION

A continued ENE is set for January 29, 2025. This extension is necessary to allow the parties to participate in the continued ENE and have ample time to complete all appropriate discovery, as well as preserve attorneys' fees and costs towards good faith mediation.

PROPOSED REVISED DISCOVERY PLAN

1. Discovery Cut-Off Date:

The Parties' current deadline for completing discovery is February 17, 2025. The Parties' request that the Court extend that deadline to **Monday, May 19, 2025**.

2. Dispositive Motions:

The Parties' current deadline to file dispositive is March 19, 2025. The Parties' request that the Court extend that deadline to **Tuesday, June 17, 2025**.

3. Pretrial Order:

The Parties current deadline for filing the Joint Pretrial Order is April 18, 2025. The Parties' request that the Court extend that deadline to **Thursday, July 17, 2025**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

4. Extensions or Modifications of the Discovery Plan and Scheduling Order:

In accordance with Local Rule 26-3, a stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty (21) days before the expiration of the subject deadline.

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1 The Parties make this stipulation in good faith and not for the purposes of undue burden or
2 delay.

3 Dated: January 27, 2025

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5 /s/ Robert Montes, Jr.

6 JASON KULLER, ESQ.
7 RACHEL MARINER, ESQ.
8 ROBERTO MONTES, JR., ESQ.

9 RAFII & ASSOCIATES, P.C.

10 *Attorneys for Plaintiff*
11 CARRIEL KING

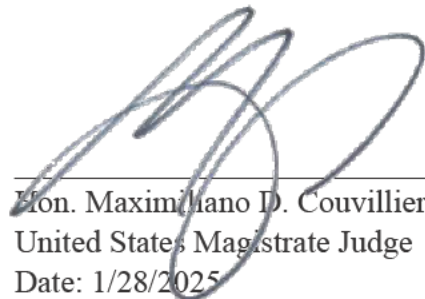


12 Z. KATHRYN BRANSON, ESQ.
13 AMANDA BROWDER, ESQ.

14 LITTLER MENDELSON, P.C.

15 *Attorneys for Defendant*
16 AMAZON.COM SERVICES LLC

17 **IT IS SO ORDERED.**



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Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 1/28/2025